UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	§	
	§	Chapter 7
ALEXANDER E. JONES,	§	
	§	Case No. 22-33553 (CML)
Debtor.	§	
	§	

FIFTH MONTHLY FEE STATEMENT OF PORTER HEDGES LLP, AS BANKRUPTCY COUNSEL FOR CHAPTER 7 TRUSTEE, CHRISTOPHER R. MURRAY, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM OCTOBER 1, 2024 THROUGH OCTOBER 31, 2024

Name of Applicant: Porter Hedges LLP, as proposed Bankruptcy

Counsel for the Chapter 7 Trustee,

Christopher R. Murray

Date of Retention Order: July 30, 2024 (Doc. No. 792)¹

Period for which Fees and Expenses areOctober 1, 2024 through and including

Incurred: October 31, 2024

Interim Fees Incurred: \$159,590.50

Interim Payment of Fees Requested (80%): \$127,672.40

Interim Expenses Incurred: \$4,848.08

Total Fees and Expenses Due: \$132,520.48

This is the Fifth Monthly Fee Statement.

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¹ The Trustee's application to employ Porter Hedges was filed at Docket No. 756.

Porter Hedges LLP ("<u>Porter Hedges</u>"), as Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray (the "<u>Trustee</u>"), submits this Fifth Monthly Fee Statement (the "<u>Fee Statement</u>") for the period from October 1, 2024 through October 31, 2024 (the "<u>Application Period</u>") in accordance with the proposed *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Trustee* [Docket No. 793] (the "<u>Interim Compensation Order</u>").

Porter Hedges requests compensation for professional services rendered in the amount of \$159,590.50 (the "Fees"), and for reimbursement of out-of-pocket expenses incurred in the amount of \$4,848.08 (the "Expenses"), for the period from October 1, 2024 through October 31, 2024. Eighty percent (80%) of the fees equals \$127,672.40 and one hundred percent (100%) of the Expenses equals \$4,848.08 for a total requested amount of \$132,520.48.

Summaries of the calculations for these fees by project category and expenses are attached hereto as **Exhibit 1** and **Exhibit 2**, respectively. A summary of the time expended by Porter Hedges attorneys and support staff, together with their respective hourly rates, is attached hereto as **Exhibit 3**. Porter Hedges' invoice for the Application Period is attached hereto as **Exhibit 4**.

WHEREFORE, Porter Hedges respectfully requests payment and reimbursement in accordance with the procedures set forth in the proposed Interim Compensation Order (*i.e.*, payment of eighty percent (80%) of the compensation sought, in the amount of \$127,672.40 and reimbursement of one hundred percent (100%) of expenses incurred in the amount of \$4,848.08 in the total amount of \$132,520.48.

Dated: November 6, 2024

Houston, Texas

Respectfully Submitted,

By: /s/ Joshua W. Wolfshohl
PORTER HEDGES LLP

Joshua W. Wolfshohl (TX Bar No. 24038592) 1000 Main St., 36th Floor Houston, Texas 77002 Telephone: (713) 226-6000 Facsimile: (713) 226-6248 jwolfshohl@porterhedges.com

Christopher R. Murray

Counsel for the Chapter 7 Trustee,

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on November 6, 2024.

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl

$\underline{\textbf{EXHIBIT 1}}$ Summary of Time Expended by Project Category

Project Category	Total Hours	Total Fees Requested
Asset Analysis/Recovery	213.40	145,288.50
Case Administration	10.00	4,411.50
Employment/Fee Application	3.50	2,187.50
Litigation/Contested Matters	11.80	7,703.00
TOTAL	238.70	159,590.50

EXHIBIT 2

SUMMARY OF OUT-OF-POCKET EXPENSES

Expenses	Cost
Computer Assisted Legal Research	1,286.82
Computer Services	2,283.80
Reproduction	128.10
Reproduction Services	1,052.52
Working Meals	96.84
TOTAL	4,848.08

 $\underline{\textbf{EXHIBIT 3}}$ Summary of Time Expended by Attorneys and Support Staff

Professional	Hourly Rate	Total Hours
Derek V. Forinash	\$950.00	2.20
Joshua W. Wolfshohl	\$945.00	30.90
Adam K. Nalley	\$900.00	25.70
Christine M. McMillan	\$785.00	2.60
Matthew R. Baughman	\$750.00	3.20
William R. Stukenberg	\$725.00	4.80
Michael B. Dearman	\$625.00	72.40
Jordan T. Stevens	\$595.00	6.40
Kenesha L. Starling	\$575.00	42.20
Daisy Puente	\$565.00	5.80
Grecia V. Sarda	\$500.00	32.70
Carey A. Sakert	\$470.00	1.50
Mitzie L. Webb	\$465.00	3.60
Janice M. Thomas	\$420.00	1.10
Eliana Garfias	\$405.00	3.60
TOTAL		238.70

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PORTER HEDGES LLP

A REGISTERED LIMITED LIABILITY PARTNERSHIP

DEPT. 510 P.O. BOX 4346 HOUSTON, TEXAS 77210-4346

TELEPHONE (713) 226-6000 TELECOPIER (713) 228-1331

ATTN: CHRIS MURRAY Invoice Date: November 05, 2024

> Invoice Num.: 569800 Matter Number: 018577-0001

Billing Attorney: Tax ID: #74-2174193

Joshua W. Wolfshohl

Matter: Alex Jones

For professional services rendered and costs incurred through October 31, 2024

Professional Services 159,590.50

Disbursements 4,848.08

Total Amount Due \$164,438.58

Client: CHRIS MURRAY, CHAPTER 7 TRUSTEE Invoice Date: November 05, 2024

Matter: Alex Jones Invoice Num.: 569800

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Time Detail

<u>Date</u>	<u>Initials</u>	Description	<u>Hours</u>	Amount
10/01/2024	MBD	Continue draft motion to ratify employment and compensation of BlackBriar (.8); reviewing employment of BlackBriar in FSS chapter 11 proceeding (.2).	1.00	625.00
10/01/2024	JWW	Emails and phone conference with C. Murray and E. Jones regarding open issues with sale and Western District case (.5); emails with Texas plaintiffs' regarding same (.2).	0.70	661.50
10/01/2024	KLS	Continue analysis of trusts owned by Alex Jones for Trustee.	1.50	862.50
10/02/2024	JWW	Review fee order and emails with M. Haseldon (.2); emails regarding turnover order and Western District case status (.4).	0.60	567.00
10/02/2024	GVS	Email exchanges with K. Starling regarding legal research on trusts.	0.20	100.00
10/02/2024	KLS	Continue analysis of trusts owned by Alex Jones for Trustee.	7.40	4,255.00
10/02/2024	JTS	Conduct legal research and analysis regarding appeal of supplemental dismissal order.	1.30	773.50
10/03/2024	GVS	Email J. Wolfshohl regarding weekly Chapter 7 Trustee call (.1); attend same (1.0); email exchanges with K. Starling regarding legal research (.2); review (.2); confer with J. Wolfshohl and M. Dearman regarding PQPR (.2); review premarital agreement (1.8); review disclosure statement (.5); email exchanges regarding state court lawsuit and receivership (.1).	4.10	2,050.00
10/03/2024	AKN	Confer with M. Dearman regarding sale of assets and related considerations for asset purchase agreement (.2); begin to draft and revise form of asset purchase agreement for asset sales (2.2).	2.40	2,160.00
10/03/2024	JWW	Meet with M. Dearman regarding sale issues (.3); weekly call with Trustee team (1.0); emails with J.	1.80	1,701.00

Date	<u>Initials</u>	Description	Hours	Amount
		Martin regarding status of turnover order issues (.2); emails with K. Starling regarding motion to expedite consideration of turnover and review local rules regarding same (.3).		
10/03/2024	MBD	Revise motion to sell Jones IP assets (.4); review transcripts and docket entries related to publishing agreement assumption (.5); conference with J. Tanenbaum, K. Toney, and C. Murray regarding auction and asset sale (.5); conference with Trustee team and PH team regarding case status (1.0); conference with A. Nalley regarding form APA and corporate issues (.4); review and analyze document production related to corporate issues (.5); correspond with PH team regarding state court receivership motion (.2).	3.50	2,187.50
10/03/2024	KLS	Weekly Teams call with Trustee.	1.00	575.00
10/03/2024	CAS	Communications with vendor regarding adding M. Dearman as reviewer.	0.20	94.00
10/03/2024	JTS	Prepare for and attend strategy session with members of the Porter Hedges and Trustee Teams (1); Continue conducting legal research and analysis in connection with a potential appeal of the Supplemental Dismissal Order (.8).	1.80	1,071.00
10/04/2024	MBD	Correspond with A. Nalley regarding resolutions and form APA (.2); compile documents related to corporate issues (.2); revise Jones IP assets sale motion (.1); correspond with E. Jones regarding same (.2); correspond with J. Tanenbaum regarding press release and media inquiries (.1); revise press release and media responses (.5).	1.30	812.50
10/04/2024	GVS	Review premarital agreement (.3); compile transfer of assets to evaluate potential avoidance claims (.4).	0.70	350.00
10/04/2024	JWW	Conference with W. Stukenberg and K. Starling regarding FSS employment issues (.5); conference with J. Martin and several follow-up communications regarding status of Western District case and turnover	2.10	1,984.50

Client: CHRIS MURRAY, CHAPTER 7 TRUSTEE Invoice Date: November 05, 2024

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<u>Date</u>	<u>Initials</u>	Description	<u>Hours</u>	Amount
		order (1.0); conference with C. Murray and E. Jones regarding strategy for Western District case (.4); follow-up emails regarding same (.1); conference with M. Dearman regarding sale issues (.1).		
10/04/2024	AKN	Continue to draft and revise APA for sale of assets (1.2); review bid and sale materials related to the same (.3).	1.50	1,350.00
10/04/2024	KLS	Teams call with J. Wolfshohl and W. Stukenberg regarding potential labor and employment issues.	0.40	230.00
10/04/2024	WRS	Develop strategy regarding retaining employees during bankruptcy.	1.00	725.00
10/05/2024	GVS	Review premarital agreement (.9); review ratification of same (.5); compile transfer of assets to evaluate potential avoidance claims (1.1); circulate list of same to K. Starling (.2).	2.70	1,350.00
10/07/2024	JWW	Conference call regarding hearing strategy and sale (.6); conference with counsel for Texas Plaintiffs (.2); prepare for hearing (.4); attend hearing on removal/transfer of venue (.4); emails regarding same (.2); review notice of removal of CT receivership action and emails with Trustee regarding same (.3).	2.10	1,984.50
10/07/2024	GVS	Review email from J. Wolfshohl regarding Trustee's motion to transfer venue.	0.10	50.00
10/07/2024	AKN	Continue to draft and revise asset purchase agreements for asset sales and review related documentation.	1.50	1,350.00
10/07/2024	MBD	Correspond with E. Jones regarding call with IP counsel (.2); review and revise bid package terms (1.6); correspond with J. Tanenbaum regarding same (.3); correspond with Skyhorse Publishing regarding publishing agreement (.2); attend to correspondence regarding IP issues (.2); conference with J. Wolfshohl regarding status conference W.D. Tex. (.1); correspond with PH team regarding status conference (.2).	2.80	1,750.00
10/07/2024	KLS	Teams call with W. Stukenberg and Trustee regarding labor and employment issues (.5); Teams call with J.	1.50	862.50

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<u>Date</u>	<u>Initials</u>	Description	<u>Hours</u>	Amount
		Wolfshohl and Trustee regarding Western District Status Conference (.5); attend Western District Status Conference (.5)		
10/07/2024	MLW	Email exchanges with K. Starling regarding deadline to object to contested motions (.1); review Western District Local Rules and update K. Starling regarding same (.2).	0.30	139.50
10/07/2024	WRS	Provide guidance regarding retention agreements.	1.00	725.00
10/08/2024	MBD	Review notice of appeal and correspond with PH team regarding same.	0.40	250.00
10/08/2024	AKN	Continue to revise and draft asset purchase agreements for sale of assets.	2.30	2,070.00
10/08/2024	GVS	Confer with K. Starling, M. Dearman, and J. Stevens regarding Texas plaintiff's notice of appeal.	0.30	150.00
10/08/2024	JWW	Emails regarding status of removed case (.2); review docket and appeal and emails regarding same (.1); emails regarding sale issues and next steps with motion to sell in individual case (.2); emails regarding IP issues (.1).	0.60	567.00
10/08/2024	CAS	Prepare FTP upload link for Jones Murray to forward documents to K. Starling (.2); set up e-discovery vendor with access to FTP uploads and confer with K. Dvorak regarding same (.3).	0.50	235.00
10/09/2024	GVS	Review email exchanges between M. Dearman and J. Tanenbaum regarding response to media inquiries.	0.10	50.00
10/09/2024	MBD	Correspond with Paul Weiss team regarding information access (.1); correspond with Trustee regarding same (.1); correspond with J. Tanenbaum regarding bid packages (.1); revise media inquiry response and correspond with J. Tanenbaum and C. Murray regarding same (.1); correspond with J. Wolfshohl regarding Jones assets (.1).	0.50	312.50
10/10/2024	JWW	Emails regarding sale issues and other related matters in case.	0.30	283.50

Date	<u>Initials</u>	Description	<u>Hours</u>	Amount
10/11/2024	GVS	Review email from M. Dearman regarding drafting 9019 motion (.1); confer with M. Dearman regarding same (.1); review in preparation to draft 9019 motion (.9).	1.10	550.00
10/11/2024	MBD	Conference with J. Tanenbaum and K. Toney regarding sale issues (.5); conference with J. Wolfshohl regarding potential settlements (.2); conference and correspond with G. Sarda regarding draft 9019 motion and order (.3); conference with J. Tanenbaum regarding NDAs (.2).	1.20	750.00
10/11/2024	JWW	Conference with C. Murray regarding (.5); emails and phone conference with M. Dearman regarding same (.3).	0.80	756.00
10/12/2024	GVS	Continue reviewing Connecticut plaintiffs' Motion for Summary Judgment.	0.60	300.00
10/12/2024	MBD	Multiple correspondence with J. Tanenbaum and interested party regarding disclosures timeline and sale issues.	0.30	187.50
10/13/2024	MBD	Review demand letter (.1); correspond with C. Murray, E. Jones, and J. Wolfshohl regarding same (.1); correspond with D. Forinash regarding trademark issues (.2); update Jones IP sale motion (.1); correspond with C. Murray regarding same (.1).	0.60	375.00
10/13/2024	GVS	Continue reviewing Connecticut plaintiffs' Motion for Summary Judgment (.3); begin drafting 9019 motion (.9).	1.20	600.00
10/14/2024	GVS	Continue drafting 9019 motion (3.7); confer with M. Dearman regarding 9019 motion (.1); circulate draft of same to M. Dearman for review (.1).	3.90	1,950.00
10/14/2024	JWW	Emails regarding status of settlements and drafts of 9019 motions (.3); emails regarding IP issues and conference with M. Dearman regarding same (.7); emails regarding discussions with CT plaintiffs (.2); emails regarding sale	1.30	1,228.50

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Date	<u>Initials</u>	<u>Description</u> materials and requests for information (.1).	<u>Hours</u>	Amount
10/14/2024	MBD	Correspond with A. Nalley regarding form APA (.1); correspond with D. Forinash and J. Pierce regarding trademark issues (.1); multiple correspondence with C. Murray, E. Jones, and J. Wolfshohl regarding same (.3); conference with G. Sarda regarding draft 9019 order (.1); correspond with K. Starling regarding potential fraudulent transfer claims (.2); correspond with M. Webb and E. Garfias regarding emergency hearing (.2); revise Jones IP Asset sale motion (.8); conference with K. Starling regarding employment agreements (.2); conference with J. Wolfshohl regarding same (.2); correspond with C. Murray regarding trademark issues (.1); draft response letter to opposing counsel regarding trademarks (1.5); review and revise draft 9019 motion and begin draft order (2.0); analyze case law governing trademark issues (.5).	6.30	3,937.50
10/14/2024	MLW	Email exchanges with M. Dearman regarding obtaining court's availability for emergency hearing on sale motion.	0.10	46.50
10/14/2024	DVF	Review proposed trademark infringement letter and analyze trademark use for potential fair use.	1.00	950.00
10/14/2024	EG	Review docket updates for scheduled hearings and upcoming deadlines.	0.20	81.00
10/14/2024	KLS	Review Free Speech Systems and Alex Jones employment contracts for Trustee.	4.50	2,587.50
10/14/2024	WRS	Provide guidance regarding retention agreements.	0.80	580.00
10/15/2024	GVS	Review M. Dearman's edits and make modifications to 9019 motion (1.5); begin drafting settlement order (3.5); circulate same to M. Dearman for edits (.1).	5.10	2,550.00
10/15/2024	MBD	Review and revise draft 9019 motion and draft order (2.5); multiple correspondence with G. Sarda regarding same (.2); conference with J. Tanenbaum regarding leases (.2); review document production, pleadings, and	4.50	2,812.50

<u>Date</u>	<u>Initials</u>	Description	<u>Hours</u>	Amount
		schedules for lease information (.5); correspond with J. Tanenbaum regarding same (.1); finalize Jones IP Assets sale motion (.5); multiple correspondence with J. Wolfshohl and C. Murray regarding same (.2); conference and correspond with M. Webb and E. Garfias regarding Jones IP Assets sale motion service and filing (.3).		
10/15/2024	JWW	Emails and conference regarding open settlements in A. Jones case and related issues (.3); emails and phone conference with M. Dearman regarding IP property sale issues (.3); emails with CT counsel regarding call to discuss proposal (.1); conference with C. Murray regarding same (.1); conference with CT plaintiffs regarding status of estate assets, PQPR settlement and overall case settlement (.8); review PQPR order and emails regarding same (.2).	1.80	1,701.00
10/15/2024	AKN	Draft and revise asset purchase agreement.	4.70	4,230.00
10/15/2024	MLW	Email exchanges with M. Dearman regarding Court's availability for hearing on emergency motion (.2); confer with Court Case Manager and update M. Dearman regarding same (.2); forward filed Emergency Motion to Case Manager (.2).	0.60	279.00
10/15/2024	EG	Correspondence on updating service list (.2); further emails on filing logistics of emergency sale motion (.2); receive, review, and electronically file same with court (.3); download and circulate filed version (.1).	0.80	324.00
10/16/2024	MBD	Draft notice of hearing (.2); revise 9019 motion and order (.8); multiple correspondence with C. Murray and G. Sarda regarding same (.2); conference with J. Wolfshohl regarding case status and IP issues (.5); correspond with C. Murray regarding Jones IP asset sale order (.2); review and revise press responses from opposing counsel (.2); correspond with C. Murray and E. Jones regarding same (.1); revise form APA (2.5); conference with J. Tanenbaum regarding internet domains (.3); review Debtor's schedules of IP assets (.2);	6.40	4,000.00

<u>Date</u>	<u>Initials</u>	Description	<u>Hours</u>	Amount
		correspond with J. Wolfshohl and A. Nalley regarding draft form APA (.1); analyze case law governing property of the estate issues (1.1).		
10/16/2024	JWW	Review PQPR motion and provide comments to same (.5); review comments from C. Murray and emails regarding filing of same and status of CT/TX settlement (.4); conference with R. Chappel regarding receivership action (.4); emails regarding open sale issues (.3); conference with M. Dearman regarding same (.3).	1.90	1,795.50
10/16/2024	GVS	Review email and attachments from M. Dearman regarding 9019 motion and order (.3); review Trustee's edits to same (.2); make modifications to same and circulate to M. Dearman for review (1.3); check-in call with M. Dearman (.1); email exchanges with chapter 7 Trustee (.1); email M. Webb and E. Garfias regarding filing emergency motion (.1); review M. Dearman's redlines of 9019 motion and order (.2); confer with M. Dearman regarding drafting motion to enforce the stay (.2).	2.50	1,250.00
10/16/2024	EG	Coordinate service of emergency motion.	0.30	121.50
10/17/2024	AKN	Review and revise draft of APA (1.2); revise to incorporate certain comments from M. Dearman (.8); confer with M. Dearman regarding the same (.2).	2.20	1,980.00
10/17/2024	JWW	Phone conference with Trustee team regarding open sale issues and receivership (.4); further conference with M. Dearman (.1); emails regarding numerous open issues with IP and other matters (.4); conference with counsel for prospective buyer (.4); further call with M. Dearman (.1): follow-up emails regarding issues for discussion on Friday call (.1); review and finalize fee statement (.2).	1.70	1,606.50
10/17/2024	GVS	Confer with K. Starling, M. Dearman, and J. Stevens regarding Lafferty hearing today (.1); confer with M. Dearman regarding potential emergency motion filing tomorrow (.1).	0.20	100.00
10/17/2024	MBD	Review and analyze domain name issues (.5);	2.40	1,500.00

<u>Date</u>	<u>Initials</u>	Description correspond with J. Wolfshohl regarding same (.2); conference with D. Blabey and J. Wolfshohl regarding auction (.1); conference with J. Tanenbaum and K. Toney regarding auction and sale process (.5); conference with potential bidder (.2); review data room information (.2); conference with J. Wolfshohl regarding bidding process and case status (.2); finalize and send trademark infringement letter (.2); conference and correspond with M. Webb regarding emergency hearing (.3).	<u>Hours</u>	Amount
10/17/2024	MLW	Email exchanges with M. Dearman regarding hearing on Emergency Motion to Sell (.4); confer with Court Case Manager regarding same (.2); receive/file Notice of Hearing with copy to Court Case Manager (.3); coordinate printing/mailing of Notice (.2).	1.10	511.50
10/17/2024	EG	Correspondence on filing logistics of notice of hearing (.2); continuous monitoring of emails for status of same (.5); receive, review, and electronically file same with court (.2); download and circulate filed version (.1); update file (.1).	1.10	445.50
10/17/2024	KLS	Complete review of Free Speech Systems and Alex Jones employment contracts for Trustee.	1.20	690.00
10/17/2024	CAS	Receive additional client documents and coordinate with vendor to load new documents into database.	0.30	141.00
10/18/2024	MBD	Conference with Trustee team and PH team regarding Alex Jones case (.8); revise form APA and correspond with A. Nalley regarding same (.5); correspond with C. Murray, J. Tanenbaum, and K. Toney regarding same (.1); correspond with PH team, C. Murray, and E. Jones regarding draft 9019 order (.3); conference with C. Murray, E. Jones, and K. Starling regarding same (.3); review and revise draft 9019 order (.5); begin draft PH first interim fee application (.5); conference with counsel to PQPR regarding draft case status (1.0); correspond with L. Lieberman regarding auction process (.2); multiple correspondence with interested party	4.80	3,000.00

<u>Date</u>	<u>Initials</u>	Description	<u>Hours</u>	<u>Amount</u>
		regarding NDA (.3); conference with J. Wolfshohl regarding PQPR call (.2); correspond with J. Tanenbaum regarding interested party (.1).		
10/18/2024	GVS	Attend weekly check-in call with PH team and Chapter 7 Trustee.	0.80	400.00
10/18/2024	AKN	Revise draft of asset purchase agreement to post-closing covenant regarding business premises and related matters (.7); confer with M. Dearman regarding draft of agreement (.2).	0.90	810.00
10/18/2024	JWW	Emails and conference regarding various open issues with sale and settlements (.7); conference with Trustee team regarding open issues in case (.6); several follow-up emails (.2).	1.50	1,417.50
10/18/2024	MLW	Email exchange with M. Dearman regarding possible filing of Emergency 9019 Motion.	0.20	93.00
10/18/2024	KLS	Weekly status with Trustee (.5); calls with regarding PQPR adversary (1.4); review Trustee's motion (.5).	2.40	1,380.00
10/18/2024	JTS	Prepare for and attend strategy session with members of the Porter Hedges and Trustee Teams.	0.90	535.50
10/20/2024	MBD	Correspond with potential bidder regarding NDA.	0.10	62.50
10/20/2024	GVS	Begin drafting motion to enforce stay.	4.70	2,350.00
10/21/2024	GVS	Continue drafting motion to enforce automatic stay.	0.60	300.00
10/21/2024	MBD	Continue draft first interim PH fee application (2.5); conference with potential bidder regarding NDA (.2); revise NDA and correspond with C. Murray regarding same (.1); conference with C. Murray regarding case strategy (.2); conference with C. Murray, E. Jones, and K. Starling regarding potential settlement (.3); correspond with J. Wolfshohl regarding same (.2); conference with J. Tanenbaum regarding form APA (.5); conference with E. Jones regarding case issues and strategy (1.0); revise and redline draft 9019 order and	7.10	4,437.50

Client: CHRIS MURRAY, CHAPTER 7 TRUSTEE Invoice Date: November 05, 2024

Matter: Alex Jones Invoice Num.: 569800

Matter Number: 018577-0001

<u>Date</u>	<u>Initials</u>	Description	Hours	Amount
		correspond with C. Murray, E. Jones, J. Wolfshohl and K. Starling regarding same (1.0); begin revising form APA (.7); analyze settlement terms (.4).		
10/21/2024	KLS	Teams call with Trustee regarding PQPR Issues.	0.30	172.50
10/22/2024	AKN	Review revisions to draft of asset purchase agreement (.8); correspond with M. Dearman regarding the same (.1).	0.90	810.00
10/22/2024	JWW	Emails and conference with C. Murray and Trustee team regarding IP issues and sale.	0.80	756.00
10/22/2024	MBD	Continue revising form APA (.3); attend to correspondence with C. Murray, E. Jones, and J. Wolfshohl regarding sale issues (.2); multiple correspondence with regarding NDA (.2); correspond with potential bidder regarding bid term inquiries (.1); correspond with J. Tanenbaum regarding same (.1); conference with J. Tanenbaum regarding sale process (.3); correspond with A. Nalley regarding additional assets (.2).	1.40	875.00
10/22/2024	EG	Correspondence on draft and filing logistics of witness/exhibit list.	0.20	81.00
10/22/2024	KLS	Prepare Trustee's witness and exhibit list, including associated exhibits, for October 25th Hearing.	1.50	862.50
10/22/2024	WRS	Revise retention agreements.	1.00	725.00
10/23/2024	GVS	Begin drafting proposed order for motion to enforce stay.	0.90	450.00
10/23/2024	MBD	Conference with A. Nalley regarding APA changes (.7); multiple correspondence with J. Tanenbaum and C. Murray regarding domain names (.2); analyze issues with potential settlements (1.5); correspond with J. Wolfshohl and K. Starling regarding same (.1); review witness and exhibit list and correspond with K. Starling regarding same (.1); analyze case law related to settlement issues (1.8); review changes to form APA and correspond with C. Murray and J. Tanenbaum regarding	3.90	2,437.50

<u>Date</u>	<u>Initials</u>	Description same (.3); pull terms and conditions and privacy policies from Infowars sites (.2); circulate same to interested parties (.1); draft and circulate meeting agenda to Trustee team and PH team (.1).	<u>Hours</u>	Amount
10/23/2024	AKN	Review mark-up of APA and emergency motion regarding sale (1.2); confer with M. Dearman regarding APA and revision to certain provisions in the same (.3); revise draft of APA (.8).	2.30	2,070.00
10/23/2024	EG	Follow up emails on filing logistics and status of finalizing witness/exhibit list (.2); receive, review, and electronically file same with court (.4); download and circulate filed version (.1); update file (.1).	0.80	324.00
10/23/2024	MLW	Email exchanges with K. Starling regarding witness/exhibit list (.2); review same (.4); confer with E. Garfias regarding filing (.1).	0.70	325.50
10/23/2024	KLS	Finalize exhibits for October 25th Hearing (.5); review term sheet regarding potential settlement (1.0); prepare initial draft employee and contractor agreements regarding wind-down of Free Speech Systems (8.5).	10.00	5,750.00
10/24/2024	GVS	Attend weekly check-in call with PH team and Chapter 7 Trustee (1.5); continue drafting motion to enforce stay (1.3); circulate draft of same to M. Dearman (.1).	2.90	1,450.00
10/24/2024	JWW	Review docket and agenda and prepare for weekly call regarding all open matters in case (.3); conference call with Trustee team regarding sale hearing, settlement status and other related matters (1.6); review A. Jones objection and emails and phone conference regarding same (.7); conference call with Trustee team regarding comments from A. Jones and hearing preparation (.6); follow-up emails regarding same (.2); further review of revised order and emails regarding filing same and status of hearing (.3).	3.70	3,496.50
10/24/2024	MBD	Conference with Trustee team and PH team regarding case status and strategy (1.4); conference with J. Tanenbaum, C. Murray, and E. Jones regarding sale	9.10	5,687.50

<u>Date</u>	Initials	process (.4); review and analyze organizational and trust documents (1.0); multiple correspondence with M. Baughman and A. Nalley regarding same (.6); correspond with K. Starling regarding (.2); analyze limited objection to Jones IP Assets motion (.4); analyze case law governing executory contract issues (.8); analyze and revise proposed Jones IP Assets order (1.5); multiple correspondence with Trustee team and PH team regarding same (.5); conference with C. Murray, E. Jones, J. Wolfshohl and K. Starling regarding same (.8); draft witness outline for Jones IP Assets sale hearing (1.5).	<u>Hours</u>	Amount
10/24/2024	AKN	Review entity documents for (1.5); confer with M. Baughman regarding matters in connection with the same (.3).	1.80	1,620.00
10/24/2024	KLS	Status call via Teams with Trustee (1.5); Teams call with Trustee regarding proposed sale order (.5); review employee benefits information (1.3).	3.30	1,897.50
10/24/2024	CAS	Email communications with K. Starling regarding correct custodian and source data for new documents to be added to database.	0.20	94.00
10/24/2024	JTS	Prepare for and attend extended strategy session with members of the Porter Hedges and Trustee Teams.	1.50	892.50
10/24/2024	MRB	Review documents relating to and related entities (1.3); discuss with A. Nalley (.2).	1.50	1,125.00
10/25/2024	AKN	Confer with M. Baughman and M. Dearman regarding (.2); begin to review note and security agreement to analyze options (.6).	0.80	720.00
10/25/2024	MBD	Correspond and conference with K. Starling regarding final proposed order and filing (.3); attend hearing on Jones IP Assets (.4); conference with J. Wolfshohl	4.00	2,500.00

<u>Date</u>	<u>Initials</u>	Description regarding same (.2); analyze case law governing property of estate issues (1.5); attend to numerous correspondence regarding Jones IP Assets (1.0); correspond with A. Nalley regarding corporate analysis (.2); revise form APA (.3); correspond with J. Tanenbaum regarding same (.1).	<u>Hours</u>	Amount
10/25/2024	JWW	Prepare for hearing (1.0); attend hearing and follow-up conference with client regarding same (1.1); follow-up conference and emails with M. Dearman and Trustee team regarding next steps with IP assets (.5).	2.60	2,457.00
10/25/2024	EG	Correspondence on filing logistics of Sale Motion Proposed Order.	0.20	81.00
10/25/2024	KLS	Draft proposed and redline sale order (1.2); call regarding employee contracts (.5); (continue revising employee contracts (3.1).	4.80	2,760.00
10/25/2024	MLW	Email exchanges with K. Starling regarding proposed Order - Sale Motion (.2); receive and file same with copy to Court Case Manager (.4).	0.60	279.00
10/25/2024	CAS	Email communications with vendor regarding organization and identification of data sets within database.	0.30	141.00
10/25/2024	MRB	Continue review of documents relating to and related entities (.9); discuss with A. Nalley and M. Dearman (.3).	1.20	900.00
10/26/2024	AKN	Review note and security agreement to (1.3); confer with C. McMillan regarding the same (.2).	1.50	1,350.00
10/28/2024	AKN	Confer with C. McMillan regarding review of note and security agreement and (.2); continue to review documents to analyze the same (.5); review summary and analysis prepared by C. McMillan (.6).	1.30	1,170.00
10/28/2024	CMM	Review security agreement and note and prepare email summary of	2.60	2,041.00

<u>Date</u>	<u>Initials</u>	<u>Description</u> findings.	<u>Hours</u>	Amount
10/28/2024	JWW	Emails regarding next steps with sale process (.3); review and revise settlement term sheet and emails regarding same (.6); conference with E. Jones regarding open sale issues (.4); emails with team regarding discussion with Tranzon (.1).	1.40	1,323.00
10/28/2024	MBD	Conference with D. Forinash regarding intellectual property issues (.4); conference with C. Murray regarding case strategy (.3); analyze executory contract terms (1.0); analyze case law governing assignability (1.2); review and revise potential settlement agreement (.5).	3.40	2,125.00
10/28/2024	DVF	Researching IP issues associated with ownership of social media accounts and internet domain names and discussing with M. Dearman.	1.20	1,140.00
10/29/2024	JWW	Emails regarding next steps with sale and potential resolution with Debtor (.4); conference with Tranzon regarding same (.6); further call with Trustee team regarding next steps (.8); review revised agreed order (.1); emails with counsel for X regarding account transfer issues (.2).	2.10	1,984.50
10/29/2024	MBD	Conference with E. Jones, J. Wolfshohl, and J. Tanenbaum regarding sale strategy (.3); conference with A. Nalley regarding case status and strategy (.2); analyze case law governing intellectual property sales (1.0); conference with C. Murray, E. Jones, and J. Wolfshohl regarding asset sales (.4); conference with E. Jones regarding agreed order and sale issues (.5); draft agreed order (.9); correspond with C. Murray, E. Jones, and J. Wolfshohl regarding same (.1).	3.40	2,125.00
10/30/2024	JWW	Conference with counsel for X regarding sale of accounts (.4); numerous follow-up emails and conference with M. Dearman regarding same and sale of business assets from personal estate (1.1).	1.50	1,417.50
10/30/2024	KLS	Teams call with W. Stukenberg regarding draft retention	1.50	862.50

<u>Date</u>	<u>Initials</u>	<u>Description</u> agreements (.5); revise draft retention agreements per Teams call with W. Stukenberg (1.0).	<u>Hours</u>	<u>Amount</u>
10/30/2024	MBD	Attend to correspondence regarding with Trustee team and PH team regarding Jones IP assets (.1); analyze case law regarding same (1.0); correspond with E. Jones regarding analysis of same (.2); multiple correspondence with K. Starling regarding employment agreements (.2);	1.50	937.50
10/30/2024	WRS	Provide strategy regarding retention agreements.	1.00	725.00
10/31/2024	JMT	Attention to matters concerning Westlaw research with regard to	1.10	462.00
10/31/2024	AKN	Confer with C. McMillan regarding note and collateral and process for foreclosing on the same under UCC (.2); draft and revise summary of note and security agreement provisions and analysis of same with respect to PQPR equity interests (1.3); correspond with M. Dearman regarding the same (.1).	1.60	1,440.00
10/31/2024	KLS	Weekly Teams call with the Trustee.	0.90	517.50
10/31/2024	JTS	Prepare for and attend strategy session with members of the Porter Hedges and Trustee Teams.	0.90	535.50
10/31/2024	MBD	Conference with J. Wolfshohl regarding fee application (.1); conference with Trustee team and PH team regarding case status and strategy (.9); review analysis of note and security agreement (.4); analyze case law on trusts (.8); conference with E. Jones regarding potential settlements (.3).	2.50	1,562.50
10/31/2024	DP	Research and summarize	5.80	3,277.00
10/31/2024	JWW	Several emails and phone conferences regarding open sale issues and IP issues (.5); weekly call with trustee team regarding open issues in case (.8); follow-up emails regarding open issues (.3).	1.60	1,512.00
10/31/2024	MRB	Review email from A. Nalley regarding issues	0.50	375.00

Working Meals

Total Disbursements

Client: CHRIS MURRAY, CHAPTER 7 TRUSTEE Invoice Date: November 05, 2024

Matter: Alex Jones Invoice Num.: 569800

Matter Number: 018577-0001

96.84

\$4,848.08

<u>Date</u>	<u>Initials</u> <u>Descr</u>	ription		<u>Hours</u>	<u>Amount</u>			
		(.3); discuss with C. McMillin (.2).						
Total				238.70	\$159,590.50			
Total Ser	rvices				\$159,590.50			
Timekee	per Summary							
<u>Initials</u>	Name	<u>Timekeeper Title</u>	<u>Hours</u>	Rate	Amount			
DVF	Derek V. Forinash	Partner	2.20	950.00	2,090.00			
JWW	Joshua W. Wolfshohl	Partner	30.90	945.00	29,200.50			
AKN	Adam K. Nalley	Partner	25.70	900.00	23,130.00			
CMM	Christine M. McMillan	Partner	2.60	785.00	2,041.00			
MRB	Matthew R. Baughman	Partner	3.20	750.00	2,400.00			
WRS	William R. Stukenberg	Partner	4.80	725.00	3,480.00			
MBD	Michael B. Dearman	Associate	72.40	625.00	45,250.00			
JTS	Jordan T. Stevens	Associate	6.40	595.00	3,808.00			
KLS	Kenesha L. Starling	Associate	42.20	575.00	24,265.00			
DP	Daisy Puente	Associate	5.80	565.00	3,277.00			
GVS	Grecia V. Sarda	Associate	32.70	500.00	16,350.00			
CAS	Carey A. Sakert	Paralegal	1.50	470.00	705.00			
MLW	Mitzie L. Webb	Paralegal	3.60	465.00	1,674.00			
JMT	Janice M. Thomas	Paralegal	1.10	420.00	462.00			
EG	Eliana Garfias	Paralegal	3.60	405.00	1,458.00			
Total			238.70		\$159,590.50			
	Cost Summary							
<u>Description</u>					Amount			
Computer Assisted Legal Research					1,286.82			
Computer Services					2,283.80			
Reproduction					128.10			
Reproduc	Reproduction Services 1,052.52							

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PORTER HEDGES LLP

Client: CHRIS MURRAY, CHAPTER 7 TRUSTEE Invoice Date: November 05, 2024

Matter: Alex Jones Invoice Num.: 569800

Matter Number: 018577-0001

Total This Invoice \$164,438.58